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November 15, 2023

Honorable Dennis Montali  
United States Bankruptcy Court  
450 Golden Gate Ave, Courtroom 17  
Mail Box 36099  
San Francisco, CA 94102

**Re: *In re Roman Catholic Archbishop of San Francisco*  
Case No. 23-30564**

Dear Judge Montali:

As counsel for The Roman Catholic Archbishop of San Francisco, the debtor in the above referenced case, we write to inform the Court of an impasse on the wording of the question to be inserted into the Confidential Survivor Proof of Claim Form supplement.

The parties were to meet and confer over the exact language, which they have done. The parties, however, are unable to agree on the phrasing of the question and need the assistance of the Court. Here are the two versions offered by the insurers and the Committee for the Court's consideration:

- Insurers: Do you know if the Archdiocese or a church, school, parish, or Archdiocesan organization knew or should have known about your abuse? If so, identify how it knew or should have known and when.
- Committee: Do you know if anyone told the Archdiocese or a church, school, parish, or Archdiocesan organization about your abuse? If so, identify who told, who was told and when.

The Debtor is not taking a position on either question phrasing, but we do need the Court's direction so that we can submit an order with exhibits for the Court to sign and begin the noticing procedures as soon as possible.

We have informed both counsel for the insurers and the Committee that we would be submitting this letter to the Court. We are copying counsel that actively participated at the hearing with this letter. Both counsels ask that we inform the





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Court that if it wishes to hear from them as to why their form of question should be adopted, they can do so within a day.

We regret not being able to arrive at a consensus on these issues. Once the Court provides direction on this issue, we will submit an appropriate order. Thank you for the Court's consideration.

Very truly yours,

/s/ Paul J. Pascuzzi  
Paul J. Pascuzzi

cc: James Stang (via email: [jstang@pszjlaw.com](mailto:jstang@pszjlaw.com))  
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#### CERTIFICATE OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Sacramento, State of California. My business address is 500 Capitol Mall, Suite 2250, Sacramento, CA 95814.

On today's date, I served true copies of this document on the interested parties in this action as follows:

☒ **BY EMAIL:** [Montali\\_orders@canb.uscourts.gov](mailto:Montali_orders@canb.uscourts.gov); [jstang@pszjlaw.com](mailto:jstang@pszjlaw.com); [bmichael@pszjlaw.com](mailto:bmichael@pszjlaw.com); [afrankel@stblaw.com](mailto:afrankel@stblaw.com); [mweiss@phrd.com](mailto:mweiss@phrd.com); [Catalina.Sugayan@clydeco.us](mailto:Catalina.Sugayan@clydeco.us)

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on November 15, 2023, at Sacramento, California.

/s/ Brenda Jennings  
Brenda Jennings

